

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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AUTOEXPO ENT INC., PEACE PROPERTIES, LLC,
NETWORK REINSURANCE COMPANY INC.,
AUTO EXCHANGE CENTER, LLC, and CHROME
INSURANCE AGENCY LLC,

Plaintiffs,

CV 2:23-cv-9249

-against-

OMID ELYAHOU, SIMPSOCIAL LLC, FIFTY SEVEN
CONSULTING CORP. d/b/a CERTIFIED AUTO GROUP
a/k/a CERTIFIED PERFORMANCE MOTORS, AVI EITAN
and FAZEEDA KASSIM,

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon defendants Fifty Seven Consulting Corp., d/b/a Certified Auto Group a/k/a Certified performance Motors, Avi Eitan and Fazeeda Kassim (collectively "defendants") memorandum of law in support of motion to dismiss complaint, dated May 13, 2024, and Declaration of Matthew T. Feinman, Esq. in Support of Defendants Motion to Dismiss Plaintiffs' Complaint, and annexed exhibits ("complaint"), defendants will move this Court, Hon. Orelia E. Merchant, U.S.D.J., United States Courthouse, 225 Cadman Plaza East, Courtroom 6C South, Brooklyn, New York 11201, on a date to be determined by the Court, for an order dismissing the complaint as against defendants, Fifty Seven Consulting Corp., d/b/a Certified Auto Group a/k/a Certified performance Motors, Avi Eitan and Fazeeda Kassim (i) pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure (FRCP), or (ii) in the alternative, pursuant to FRCP 12(b)(1) and (6), and (iii) for such other and further relief as may be just, proper and equitable.

PLEASE TAKE FURTHER NOTICE that, in accordance with this Court's Scheduling Order, entered June 7, 2024, Defendants' Reply Memorandum of Law in Further Support of their Motion to Dismiss dated July 1, 2024 with the Supporting Exhibit and Declaration along with the fully brief motion are being filed and served on July 1, 2024.

Dated: Carle Place, New York
July 1, 2024

LAW OFFICE OF STEVEN COHN, P.C.

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